Lessons Learned – April to June 2002

Performance Work Statement (PWS) Development Phase

Independent Review Document Requirement

Program Advisory 02-10 details final hard copies of key documents (Solicitation, MEO, QASP, TPP) must be forwarded to the IR Support Contractor and either the Naval Audit Service for studies of 41 or greater FTE, or the claimant IRO for studies with 40 or fewer FTE, and arrive at least seven working days prior to the scheduled review start date. The Solicitation document must be complete, as posted for bidders, (Sections B-M) with all amendments. If documents are unavailable or incomplete, the review start date will be deferred until the necessary documents are provided.

Management Plan Development Phase

QASP verification

The OMB Circular A-76 Revised Supplemental Handbook states that the Quality Assurance Surveillance Plan (QASP) should describe the methods of inspection to be used, the reports required and the resources to be employed with estimated work-hours. During Independent Review, NAVAUDSVC verifies the resources to be employed by the QASP and the estimated work hours. Although the resources are not in the MEO, the QASP should describe the manpower and other resources that are planned to inspect the MEO or the contractor.

Address each performance requirement

CA Teams developing the Technical Performance Plan should be aware of the requirements of Program Advisory 02-03, which states, "The Management Plan must clearly address each performance requirement from the PWS in a concise format to provide for appropriate review."

Cost Comparison and Administrative Appeal Phase

CAMIS requirements

Program Advisory 02-07 states that Claimant A-76 reporting requirements must be directly entered into the Commercial Activities Management Information System (CAMIS) database by field activities. Some CA Teams have not been granted access by the Claimant to input their information directly.

Studies with 40 or fewer FTE

The Independent Review procedure for CA studies with 40 or fewer civilian positions is summarized as follows:

- The CA Team is responsible for requesting IR support from the Claimant.
- The Claimant nominates the Independent Review Officer; the NAVAUDSVC is not involved.

• The activity then request IR support through the 3SO website: www.navystrategicsourcing.org

The A-76 Revised Supplement Handbook states that the IRO should be a qualified person from an impartial activity that is organizationally independent of the commercial activity being studied and the activity preparing the cost comparison (Ch3.I.1). OPNAVINST 4860.7C states that the IRO must certify in writing that the Navy's PWS, QASP, IHCE, MEO, TPP and TP to comply with OMB Circular A-76 (Part I. Ch3.I.4).

Claimant IRO Training

Some claimants have facilitated training for their IROs, for instance, NAVFAC offers a service to the Claimants from their San Diego office. Additional training information is available through a link on the 3SO website: www.navystrategicsourcing.org, link under "Training heading": "Links to Other Training".

IROs are procurement officials

Independent Review Officers for Under 40 FTE CA Studies are considered procurement officials, as OMB Circular A-76 Revised Supplemental Handbook states: "Certifying officials for the PWS and Management Plan, the Independent Review Officer(s), those who sign the cost comparison form...are considered procurement officials" (page 10, Chapter 3, paragraph B.3.c).